



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

2890 WOODBRIDGE AVENUE  
EDISON, NEW JERSEY 08837-3679

## Comments on Arsynco Engineering and Monitoring Plan dated 9/16/11:

Page #	Section#	Comment
7	3.1	Please specify that these are discrete samples.
8	3.1	Remove center paragraph. The additional language regarding the new post-ex sampling scheme in the next paragraph renders this paragraph obsolete.
9	3.1	As stated in the first paragraph of 761.61: “ <i>Any person cleaning up and disposing of PCBs managed under this section shall do so based on the concentration <b><u>at which the PCBs are found.</u></b>”</i>
10	3.2.1.1	1) Decontamination requirements can be found in section 761.79(b) or (c). 2) Check citations: 761.283, 761.289, and 761.292 are all from Subpart O (Post-ex sampling to verify completion...). They do not refer to decontamination.
11	3.2.1.3	Add “options and contingency” language.
13	3.2.2 3.2.2.1	- Specify 761.40 and M <sub>L</sub> - Specify the correct paragraph within 761 and check citations in middle paragraph.-
14	3.2.2.3	Add “options and contingency” language.
15	3.2.3.1 3.2.3.2	- Specify >500 ppm and low occupancy status. Add paragraph “(a)(8)” after “(a)(7)”. - Specify >50<500 ppm and low occupancy status. Add paragraph “(a)(8)” after “(a)(7)”. Add paragraph “(a)(8)” after “(a)(7)”.
16	3.2.4	Specify <50 ppm and low occupancy status.
19	3.2.7.1	EPA agrees with Arsynco’s sampling method proposal.
23	3.3.4 3.3.6	- Typo fourth line down (delete “of”?) - Typo first line (change “involved” to “involve”).